

TO: Federal Communicaonts Commission
RE: BPL

I am not an authority on the BPL subject, but from everything I have heard, there is much uncertainty about it's affect on high-frequency communications, and in particular, amateur radio. As I understand CFR 47: Part 15, it would primarily be the responsibility of the BPL provider to insure that the service does not interfere with amateur radio communications.

My concern is however that once the "system" is in place, it would be difficult (if not impossible) to make the necessary changes to correct these shortfalls. Another concern of mine (which I have not heard anyone address) is the possible succeceptability of BPL to other services such as amateur radio. It's one thing if 1000 BPL subscribers in an area interfere with amateur communications and quite another thing if those same 1000 subscribers periodically experience problems from say one ham operator. Assuming that the ham operator is using FCC type accepted equipment and doing everything "by the book", I predict that there will be problems. This is especially a concern since there are no immunity requirements in place in the USA for BPL.

I find it humorous that the pilot programs for BPL last year were conducted in areas with very modern AC power distribution systems. I also heard a rumor that these BPL experiments were installed on power lines which were buried as opposed to overhead wiring. Since the majority of existing AC distribution has been in place for many years, most is hung by power poles in open air. Given this fact alone, I would be skeptical of results of a study which show no adverse affects to BPL.

Please put on the brakes regarding BPL at this time until further unbiased scientific research can be done. Until then, I would support promoting other technologies such as fiber-optic systems where RF emissions and susceptibility would not be a significant hurdle.

Sincerely,
Mr. James Asp
EMC Engineer